

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

(1) DEBORAH LOGAN, special administrator,)
of the Estate of DARIUS HATFIELD)
)
Plaintiff,)
)
v.) Case No. 4:20-cv-00303-JED-FHM
)
(1) VIC REGALADO, in his official capacity) **Removed from Tulsa County**
as TULSA COUNTY SHERIFF, and)
individually;)
)
(2) DAVID PARKER, in his official capacity) **District Court**
as TULSA COUNTY JAIL)
ADMINISTRATOR, and individually;)
)
(3) BOARD OF COUNTY)
COMMISSIONERS OF TULSA)
COUNTY;)
)
(4) TURN KEY HEALTH, LLC, d/b/a)
TURN KEY MEDICAL, and TURN KEY;)
)
(5) JAILER JOHN DOE I, individually;)
)
(6) JAILER JOHN DOE II, individually;)
)
(7) NURSE JANE/JOHN DOE III,)
individually;)
)
(8) NURSE JANE/JOHN DOE IV,)
individually;)

Defendants.

STATUS REPORT ON REMOVED ACTION

This form must be filed by the removing party at the time of filing the notice of removal or within five (5) days of the filing of the notice of removal in the U.S. District Court. **Note:** Additional sheets may be used as necessary.

I. State Court Information

Identify the court from which the case is being removed.

Court: District Court of Tulsa County,
State of Oklahoma

Specify the number assigned to the case in that court.

Number: CJ-2020-01758

II. Style of the Case

Include all termed/dismissed and pending Plaintiff(s), Defendant(s), Intervenor(s), Counter-Claimant(s), Counter-Defendant(s), Cross-Claimant(s), Cross-Defendant(s), Third-Party Plaintiff(s), and Third-Party Defendant(s). Indicate the party type and the attorney(s) of record for each party.

	Party	Party Type	Attorney
1.	Deborah Logan, special administrator of the Estate of Darius Hatfield	Plaintiff	G. Gene Thompson, OBA #31243 Margaret Cook, OBA #31357 Keri D. Palacios, OBA #34175 Creek County Law PLLC 101 E. Lee Avenue Sapulpa, OK 74066 918-223-3044 gene@creekcountylaw.com and Andrew M. Casey, OBA #32371 Foshee & Yaffe 12231 S. May Ave. 405-378-3033 Andrewcasey.at.law@gmail.com
2.	Vic Regalado, in his official capacity as Tulsa County Sheriff, and individually	Defendant	Douglas A. Wilson Assistant District Attorney Chief of the Civil Division Tulsa County District Attorney's Office 500 S. Denver Avenue, Suite 827 Tulsa, OK 74103 918-596-8795 Douglas.wilson@tulsacounty.org
3.	Board of County Commissioners of Tulsa County	Defendant	Douglas A. Wilson Assistant District Attorney Chief of the Civil Division Tulsa County District Attorney's Office 500 S. Denver Avenue, Suite 827 Tulsa, OK 74103 918-596-8795 Douglas.wilson@tulsacounty.org
4.	Turn Key Health, LLC d/b/a Turn Key Medical, and Turn Key	Defendant	Joel L. Wohlgemuth, OBA #9811 Jo Lynn Jeter, OBA #20252 Barrett L. Powers, OBA #32485 NORMAN WOHLGEMUTH CHANDLER JETER BARNETT & RAY, P.C. 2900 Mid-Continent Tower 401 South Boston Avenue Tulsa, OK 74103

			(918) 583-7571
5.	John Does 5-8	Defendants	Unknown

III. Jury Demand

Was a Jury Demand made in State Court? Yes Yes, but rescinded No

Requesting Party(ies)	Date of Request
<u>Plaintiff, Deborah Logan</u>	<u>June 2, 2020</u>

IV. Complaints, Counter-Claims, Cross-Claims, Third Party Complaints, and Intervenor Complaints

List all complaint-type documents (Complaints, Amended Complaints, Counter-Claims, Amended Counter-Claims, Cross-Claims, Amended Cross-Claims, Third-Party Complaints, Amended Third-Party Complaints, Intervenor Complaints, and Amended Intervenor Complaints) filed in State Court. Indicate filing party(ies), against whom, and date filed.

Complaint-Type Document(s)	Filing Party(ies)	Against Whom	Date Filed
<u>Petition</u>	<u>Plaintiff, Deborah Logan</u>	<u>Defendants 1-8, above</u>	<u>June 2, 2020</u>

V. Unserved Parties

List parties not served at time of case removal.

Unserved Party(ies)	Reason(s) for No Service
<u>Sheriff Vic Regalado in his official and individual capacities</u>	<u>Unknown</u>
<u>David Parker in his official and individual capacities</u>	<u>Unknown</u>
<u>Board of County Commissioners of Tulsa County</u>	<u>Unknown</u>
<u>Turn Key Health Clinics, LLC</u>	<u>Unknown, but Plaintiff's counsel stated he anticipated filing an Amended Petition.</u>
<u>John/Jane Does I-IV</u>	<u>Unknown</u>

VI. Answer

Was an Answer made in State Court? Yes No

If Yes, indicate document answered, filing party(ies), and date filed.

Document Answered	Filing Party(ies)	Date Filed
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N/A		

VII. Nonsuited, Dismissed or Terminated Parties

List party(ies) nonsuited, dismissed or terminated from the State Court action. Indicate date of termination/dismissal.

Nonsuited, Dismissed or Terminated Party(ies)	Date Terminated/Dismissed
N/A	

VIII. Remaining Claims of the Parties

List all pending complaint-type documents from Section IV. Indicate filing party(ies), against whom and date filed.

Pending Complaint-Type Document(s)	Filing Party(ies)	Against Whom	Date Filed
Petition	Plaintiff, Deborah Logan	Defendants 1 -8 above	June 2, 2020

IX. Pending Motions

List all contested pending motions. Indicate filing party(ies) and date filed.

Pending Motions	Filing Party(ies)	Date Filed
N/A		

Respectfully submitted,

/s/ Jo Lynn Jeter

Joel L. Wohlgemuth, OBA #9811

Jo Lynn Jeter, OBA #20252

Barrett L. Powers, OBA #32485

NORMAN WOHLGEMUTH CHANDLER JETER

BARNETT & RAY, P.C.

2900 Mid-Continent Tower

401 South Boston Ave.

Tulsa, OK 74103

(918) 583-7571

(918) 584-7846 facsimile

**ATTORNEYS FOR DEFENDANT,
TURN KEY HEALTH CLINICS, LLC**

CERTIFICATE OF SERVICE

I certify that on the 25th day of June, 2020, I caused a true and correct copy of this document to be placed in the United States mail, first class postage fully pre-paid, addressed to:

G. Gene Thompson, Esq.

Margaret Cook, Esq.

Keri D. Palacios, Esq.

Creek County Law PLLC

101 E. Lee Avenue

Sapulpa, OK 74066

and

Andrew M. Casey, Esq.

Foshee & Yaffe

12231 S. May Ave.

Oklahoma City, OK 73170

/s/ Jo Lynn Jeter

Jo Lynn Jeter